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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 22-md-3047-YGR

MDL No. 3047

The Honorable Yvonne Gonzalez Rogers

This Document Relates to:

*Hartford Casualty Insurance Company
et al. v. Instagram, LLC et al.*, No. 1:24-
cv-01422 (D. Del.)

*Hartford Casualty Insurance Company
et al. v. Instagram, LLC et al.*, No. 25-
cv-3193 (N.D. Cal.)

**HARTFORD'S SUPPLEMENTAL
SUBMISSION REGARDING PRE-
SUIT COMMUNICATIONS**

Pursuant to the Court’s request at the April 23, 2025 motions hearing and CMO No. 23 (Dkt. 1903), Hartford Casualty Insurance Company and Sentinel Insurance Company, Ltd. (“Hartford”) respectfully submit this supplemental filing regarding the written communications between it and Instagram, LLC and Meta Platforms, Inc. (together, “Meta”) regarding the Social Media Cases that pre-dated Hartford’s First-Filed Action against Meta in Delaware.

The pre-suit communications between Hartford and Meta regarding the Social Media Cases include the following:¹

- November 1, 2024 Cover Email from Hartford to Meta, Covington (Martin Myers), and Marsh, which attached the November 1, 2024 letter (**Exhibit A**)
- November 1, 2024 Letter from Hartford to Meta (**Exhibit B**)
- June 3, 2024 Letter from Hartford to Meta (**Exhibit C**)
- December 22, 2023 Letter from Meta to Hartford (**Exhibit D**) (email attachments omitted)
- November 30, 2023 Letter from Hartford to Meta (**Exhibit E**) (email attachments omitted)
- November 8, 2023 Letter from Hartford to Meta (**Exhibit F**) (email attachments omitted)
- July 11, 2023 Letter from Meta to Hartford and June 14, 2023 Email from Hartford to Meta (**Exhibit G**)
- April 27, 2023 Letter from Meta to Hartford (**Exhibit H**)
- March 27, 2023 Letter from Hartford to Meta (**Exhibit I**)
- February 23, 2023 Email from Hartford to Meta (**Exhibit J**) (attachments omitted)

¹ At Meta’s request, the exhibits are being submitted with an accompanying Temporary Sealing Motion. Hartford reserves its rights to challenge Meta’s provisional designation of material as confidential.

1 The Court also asked for confirmation that the November 1, 2024 letter was sent to Meta
2 via email in addition to U.S. Mail. Hartford confirms that it sent the letter via **both** email and U.S.
3 Mail, and that the email correspondence included Martin Myers at Covington & Burling LLP and
4 Brian Tauscher at Marsh. *See Exhibit A.*

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6 Dated: April 24, 2025

Respectfully submitted,

7 RUGGERI PARKS WEINBERG LLP

8
9 /s/ Matthew J. Antonelli

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